Case 2:23-cv-03744 Document 1 Filed 09/26/23 Page 1 of 14

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS	, , , , , , , , , , , , , , , , , , ,	OIVIVENT THOE OF	DEFENDANT	TC .		
Rasheetta Milas			Pathways to housing PA, Inc.			
Tuoniootta mia			Pathways to housing PA, Inc.			
(b) County of Residence of First Listed Plaintiff Philadelphia			County of Residen	County of Residence of First Listed Defendant Philadelphia		
(EXCEPT IN U.S. PLAINTIFF CASES)				(IN U.S. PLAINTIFF CASES ONLY)		
			NOTE: IN LAND THE TRAC	CONDEMNATION CASES, USE TO TENDER OF LAND INVOLVED.	THE LOCATION OF	
(c) Attorneys (Firm Name,	Address, and Telephone Number)		Attorneys (If Know	n)		
Albert J. Michel	ll, P.C. 40 W. Evergreen A	ve., Ste 101,				
Philadelphia, P.	A 19118 tel# 215.922.2588	8				
II. BASIS OF JURISD	DICTION (Place an "X" in One Box	Only)	I. CITIZENSHIP OF 1 (For Diversity Cases Only		(Place an "X" in One Box for Plaintiff and One Box for Defendant)	
1 U.S. Government	▼ 3 Federal Question (U.S. Government Not a Party)			PTF DEF	PTF DEF	
Plaintiff			Citizen of This State	1 Incorporated or F of Business In		
2 U.S. Government Defendant	4 Diversity (Indicate Citizenship of Pari	ties in Item III)	Citizen of Another State	2 Incorporated and	Principal Place 5 55	
	(ximouro conscionsp of 1 are	ics in hem iii)	Ciri-	of Business In		
			Citizen or Subject of a Foreign Country	3 Foreign Nation	66	
IV. NATURE OF SUI				Click here for: Nature of	Suit Code Descriptions.	
CONTRACT 110 Insurance	PERSONAL INJURY PER	RSONAL INJURY	FORFEITURE/PENALTY 625 Drug Related Seizure	BANKRUPTCY	OTHER STATUTES	
120 Marine	310 Airplane 365 1	Personal Injury -	of Property 21 USC 881	422 Appeal 28 USC 158 423 Withdrawal	375 False Claims Act 376 Qui Tam (31 USC	
130 Miller Act 140 Negotiable Instrument		Product Liability Health Care/	690 Other	28 USC 157	3729(a)) 400 State Reapportionment	
150 Recovery of Overpayment & Enforcement of Judgmen	320 Assault, Libel &	Pharmaceutical		INTELLECTUAL PROPERTY RIGHTS	410 Antitrust	
151 Medicare Act	——————————————————————————————————————	Personal Injury Product Liability		820 Copyrights 830 Patent	430 Banks and Banking 450 Commerce	
152 Recovery of Defaulted Student Loans		Asbestos Personal Injury Product		835 Patent - Abbreviated	460 Deportation	
(Excludes Veterans)	345 Marine Product	Liability		New Drug Application 840 Trademark	470 Racketeer Influenced and Corrupt Organizations	
153 Recovery of Overpayment of Veteran's Benefits		ONAL PROPERTY Other Fraud	LABOR 710 Fair Labor Standards	880 Defend Trade Secrets	480 Consumer Credit (15 USC 1681 or 1692)	
160 Stockholders' Suits 190 Other Contract	355 Motor Vehicle 371	Truth in Lending	Act	Act of 2016	485 Telephone Consumer	
195 Contract Product Liability	H	Other Personal Property Damage	720 Labor/Management Relations	861 HIA (1395ff)	Protection Act 490 Cable/Sat TV	
196 Franchise		Property Damage	740 Railway Labor Act	862 Black Lung (923)	850 Securities/Commodities/	
	Medical Malpractice	Product Liability	751 Family and Medical Leave Act	863 DIWC/DIWW (405(g)) 864 SSID Title XVI	Exchange 890 Other Statutory Actions	
REAL PROPERTY 210 Land Condemnation		ONER PETITIONS eas Corpus:	790 Other Labor Litigation 791 Employee Retirement	865 RSI (405(g))	891 Agricultural Acts	
220 Foreclosure	441 Voting 463 A	Alien Detainee	Income Security Act	FEDERAL TAX SUITS	893 Environmental Matters 895 Freedom of Information	
230 Rent Lease & Ejectment 240 Torts to Land		Motions to Vacate Sentence		870 Taxes (U.S. Plaintiff or Defendant)	Act	
245 Tort Product Liability 290 All Other Real Property	Accommodations 530 C	General		871 IRS—Third Party	896 Arbitration 899 Administrative Procedure	
290 All Other Real Property	445 Amer. w/Disabilities - 535 I Employment Othe	Death Penalty	IMMIGRATION 462 Naturalization Application	26 USC 7609	Act/Review or Appeal of Agency Decision	
		Mandamus & Other Civil Rights	465 Other Immigration Actions	~	950 Constitutionality of	
	448 Education 555 P	Prison Condition	redons		State Statutes	
		Civil Detainee - Conditions of				
V. ORIGIN (Place an "X" is		Confinement				
x 1 Original 2 Ren	moved from 3 Remander te Court Appellate			ferred from 6 Multidistr		
			(speci)		- Litigation - Direct File	
	Cite the U.S. Civil Statute under Title VII 42 USC Sec. 2000 et se	er which you are fil	ling (Do not cite jurisdictional st	atutes unless diversity):	thus, i	
VI. CAUSE OF ACTIO	Brief description of cause: Race discrimination and retaliati	- 1				
WI DEOLIEGED IN			DEMAND \$	CHECK YES only	if demanded in complaint:	
COMPLAINT: UNDER RULE 23, F.R.Cv.P.				JURY DEMAND:		
VIII. RELATED CASE IF ANY	(See instructions):			DOGWII		
DATE	JODGEDOCKET NUMBER					
DATE SIGNATURE OF ATTORNEY OF RECORD 9/26/2023						
FOR OFFICE USE ONLY				A CONTRACTOR OF THE PARTY OF TH		
RECEIPT# AM	1OUNT A	PPLYING IFP	HIDCE	V: 0	a on	

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

	CIV	IL ACTION			
Pathways to Housing PA, Inc.	: :				
	NO.				
In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.					
SELECT ONE OF THE FOLLOWING	CASE MANAGEMENT TRACKS	:			
(a) Habeas Corpus – Cases brought under 2	28 U.S.C. § 2241 through § 2255.	()			
(b) Social Security – Cases requesting review and Human Services denying plaintiff S	ew of a decision of the Secretary of Hocial Security Benefits.	lealth			

(d) Asbestos - Cases involving claims for personal injury or property damage from exposure to asbestos. () (e) Special Management - Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special

() (f) Standard Management - Cases that do not fall into any one of the other tracks. (X)

(c) Arbitration -- Cases required to be designated for arbitration under Local Civil Rule 53.2.

9/26/2023

management cases.)

Albert J. Michell, Esq.

Plaintiff Rasheetta Milas

()

()

Date

Rasheetta Milas

Attorney-at-law

FAX Number

Attorney for

215.922.2588 Telephone

215.922.2590

albertjmichell@gmail.com

E-Mail Address

(Civ. 660) 10/02

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 2319 Montrose S	treet, Philadelphia, PA 19146					
Address of Defendant: 5201 Old York Road, Ste 108, Philadelphia, PA 19141						
	1 Old York Road, Ste 108, Philadelphia, PA 19141					
RELATED CASE IF ANY: Case Number:Judge.	: Date Terminated					
Civil cases are deemed related when Yes is answ						
 Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Does this case involve the same issue of fact or grow out of the same transaction as a prior suit Pending or within one year previously terminated action in this court? Does this case involve the validity or infringement of a patent already in suit or any earlier Numbered case pending or within one year previously terminated action of this court? Is this case a second or successive habeas corpus, social security appeal, or pro se case filed by the same individual? I certify that, to my knowledge, the within case is / is not related to any now pending or within one year previously terminated I certify that, to my knowledge, the within case is not related to any now pending or within one year previously terminated 						
action in this court except as note above.						
	t J. Michell, Esq. 76797					
Attorney-at	t-Law (Must sign above) Attorney I.D. # (if applicable)					
Civil (Place a $$ in one category only)						
A. Federal Question Cases:	B. Diversity Jurisdiction Cases:					
1. Indemnity Contract, Marine Contract, a 2. FELA 3. Jones Act-Personal Injury 4. Antitrust 5. Wage and Hour Class Action/Collective 6. Patent 7. Copyright/Trademark 8. Employment 9. Labor-Management Relations 10. Civil Rights 11. Habeas Corpus 12. Securities Cases 13. Social Security Review Cases 14. Qui Tam Cases 15. All Other Federal Question Cases. (Please)	2. Airplane Personal Injury 3. Assault, Defamation 4. Marine Personal Injury 5. Motor Vehicle Personal Injury 6. Other Personal Injury (Please specify): 7. Products Liability 8. All Other Diversity Cases: (Please specify)					
ARBITRATION CERTIFICATION (The effect of this certification is to remove the case from eligibility for arbitration)						
I, Albert J. Michell, Esquesel of record or pro se plaintiff, do hereby certify:						
Pursuant to Local Civil Rule 53.2 § 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:						
X Relief other than monetary damages is sought.						
DATE: 9/26/2023	Albert J. Michell, Esq. 76797 Attorney-at-Law (Sign here if applicable) Attorney ID # (if applicable)					
NOTE: A trial de novo will be a jury only if there has been con	mpliance with F.R.C.P. 38.					

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Rasheetta Milas

2319 Montrose Street

Philadelphia, PA 19146

Plaintiff

v.

CIVIL ACTION

DOCKET NO .:

Pathways to Housing PA, Inc.

5201 Old York Road

Suite 108

Philadelphia, PA 19141

Defendant

COMPLAINT

Comes now the Plaintiff Rasheetta Milas, by and through counsel Albert J. Michell, Esquire, and for her complaint and cause of action, states as follows:

PARTIES

- 1. Plaintiff, Rasheetta Milas (hereinafter "Plaintiff" or "Ms. Milas"), is an adult African American female and a resident of the Commonwealth of Pennsylvania who lives at 2319 Montrose Street, Philadelphia, PA 19146.
- 2. Defendant Pathways to Housing PA, Inc. (hereinafter "Defendant" or "Pathways") is a non-profit corporation incorporated and headquartered in Pennsylvania with its headquarters located at 5201 Old York Road, Suite 108, Philadelphia, PA 19141. Pathways is a person as defined in 42 U.S.C. Sec 2000e-2(a).
- 3. At all times relevant to this action the above named Defendant was "engaged in an industry affecting commerce" within the meaning of Sections 701(g) and 701(h) of Title VII, 42 U.S.C. Sections 2000e(g) and 2000e(h).

At all times relevant to this action Defendant employed 20 or more employees.

At all times relevant to this action Defendant was an "employer" within the meaning of Section 701(b) of Title VII, 42 U.S.C. Section 2000e(b).

At all times relevant to this action Defendant was an "employer" within the meaning of Section 4 of the Pennsylvania Human Relations Act (hereinafter "PHRA"), 43 P.S. Section 954.

At all times relevant to this action Defendant was an "employer" within the meaning of Section 5 of the PHRA, 43 P.S. Section 955.

JURISDICTION

4. Jurisdiction of this Court comes under 28 U.S.C. Sec. 1331 (federal question) based on Ms. Milas' claims under Sections 703(a) and 706(f)(1) of title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Sections 2000e-2(a) and 2000e-5(f)(1) and 42 U.S.C. Section 2000e3(a) ("Title VII") (employment discrimination). The state law components of this action arise under the Pennsylvania Human Relations Act, 43 P.C. Sections 953, 955 and 962(c)(1). This Court has supplemental subject matter jurisdiction over the state law components of this action pursuant to 28 U.S.C. Section 1367(a).

VENUE

5. Venue in this district is proper because the discriminatory acts complained of occurred primarily at Defendant's headquarters located within the Eastern District of Pennsylvania and Plaintiff resides in Philadelphia, Pennsylvania.

PROCEDURAL REQUIREMENTS

6. Within 180 days of the occurrences of the acts of discrimination of which she complains, Plaintiff dual filed Charges of Discrimination against Defendant with the Equal Employment Opportunity Commission (hereinafter "EEOC") and the Pennsylvania Human Relations Commission (hereinafter "PHRC") alleging race-based employment discrimination and retaliation.

The EEOC and PHRC have held exclusive jurisdiction over Plaintiff's complaints for over 10 months.

To date, neither the EEOC or PCHR have reached a conciliation agreement to which Plaintiff is a party.

On September 14, 2023, the EEOC issued a Notice of Right To Sue letter, allowing

Plaintiff to sue in Federal Court within ninety (90) days of receipt. (See attached Notice of Right to Sue letter dated September 14, 2023.)

STATEMENT OF FACTS

- 7. Defendant Pathways to Housing PA, Inc. is a domestic non-profit corporation which primarily assists individuals in obtaining housing, medical, rehabilitation, and other benefits, with its principal place of business located at the above indicated location.
- 8. Plaintiff, a black female, was hired by Defendant on or about June 13, 2020 as a Service Coordinator. Shortly thereafter she was promoted to Substance Abuse Case Manager in or about November, 2022.
- 9. Plaintiff excelled at her positions.
- 10. In or about September, 2022 Plaintiff's white female co-worker, Rosa Freeman, improperly used a company car for business and personal use for approximately 4 days without signing it out and got into an accident with the vehicle.
- 11. Defendant, by and through management, initially blamed Plaintiff for the damages to the vehicle and then subsequently blamed Ms. Freeman's three black co-workers, Lester Okalin, Juneifer Riggins, and Plaintiff, for the excessive mileage placed on the vehicle while it was being improperly used by Ms. Freeman.
- 12. Plaintiff asked to be placed on another team because she felt discriminated against but was denied and told this was not possible, even though white co-workers were freely allowed to transfer among teams.
- 13. Ms. Freeman was allowed to stay in the office to complete documentation while her black co-workers, including Plaintiff, were instructed to perform more field work, and were not permitted to stay late in the office to work on associated documentation.
- 14. In November, 2022 Clinical Director Oksana (lnu) on several occasions threatened to eliminate Plaintiff's one day a week internship with Defendant because Plaintiff supposedly was not keeping up with her case documentation.
- 15. Plaintiff only had three outstanding documents overdue during this period, while Ms Freeman, despite being given the opportunity to stay in the office to complete her documentation, had hundreds of outstanding overdue documents during that time frame and was never

reprimanded in any way for this.

- 16. On November 9, 2022 Plaintiff complained of the above racial disparities and favoritism to Vice President of Human Resources Randy Perrin.
- 17. Shortly thereafter Pathways started an investigation falsely targeting Plaintiff for fraudulent billing/documentation.
- 18. On approximately March 16, 2023 Defendant's upper management compelled Plaintiff to sign a Cease to Discuss Order, naming her as an "alleged perpetrator", but Defendant refused to tell Plaintiff what Plaintiff allegedly did wrong.
- 19. Plaintiff was contemporaneously issued an Employee Warning Report, which was to be issued to employees when they committed a violation of rules or standards of employee conduct. Defendant did not indicate what the alleged violation was, instead indicating only "Billing Investigation".
- 20. As per the Employee Warning Report Plaintiff was suspended on March 16, 2023, again without being told why.
- 21. On or about April 5, 2023 Defendant, by and through Director of Compliance Patricia Williams contacted Plaintiff and asked her to come in the next day to give a statement.
- 22. Plaintiff, concerned about not being told what she had done wrong and being continually wrongfully targeted and discriminated against, asked for her supervisor, Team leader Sarah Ells, to be present. This was denied.
- 23. Plaintiff then asked for her lawyer to be present. Defendant responded that they did not have in-house counsel scheduled, so that would not happen.
- 24. During these communications/negotiations, Ms. Williams told Plaintiff to call Mr. Perrin.
- 25. Plaintiff called Mr. Perrin the next morning and left a message and didn't hear back and so she called him again the next day, Friday April 7, 2023 and left another message, again to no avail.
- 26. Finally on Monday, April 10, 2023 Plaintiff again called Mr. Perin and got through to him, whereupon he told her she was terminated, ostensibly for job abandonment.
- 27. This was a pretextual reason as Plaintiff was on suspension at the time and was never asked to return to work.
- 28. Plaintiff's white peers engaged in similar conduct to her's but were not subject to the

above harassment, unwarranted discipline, and termination.

- 29. Plaintiff was subjected to the adverse employment decisions by Defendant on the basis of her race and in retaliation for her complaints of same and not because of any legitimate business reason.
- 30. Defendant by and through its employees humiliated, embarrassed, and subjected Plaintiff to mental distress and anguish through their deliberate discrimination and retaliation.
- 31. As a result of Defendant's discrimination and retaliation toward Plaintiff, Plaintiff suffered lost pay and benefits and other monetary damages including the necessity of hiring an attorney to file this suit.

COUNT I

Title VII - Race Discrimination/Harassment in Employment

- 32. Plaintiff incorporates paragraphs 1 through 31 as though set forth in full herein.
- 33. By the conduct set forth in the Statement of Facts above, Defendant engaged in unlawful employment discrimination in violation of Section 703 (a) of Title VII, 42 U.S.C. Section 2000e-2(a).
- 34. Taken together, the acts outlined above up to and including her ultimate termination describe a pattern of intentional discrimination and disparate treatment against Plaintiff on account of her race (black) with respect to the terms and conditions of her employment.
- 35. Taken together, the acts outlined above were intentional and describe a hostile work environment based on race.
 - (a) Plaintiff suffered the intentional discrimination outlined above because of her membership in a protected class black.
 - (b) Such discrimination was pervasive and regular.
 - (c) Such discrimination detrimentally affected the Plaintiff.
 - (d) Such discrimination would have detrimentally affected a reasonable person of the same protected class in her position.
 - (e) There existed in the corporate Defendant respondeat superior liability for the actions of its agents and employees.
- 36. Defendant's acts of discrimination as aforesaid were intentional, willful, and in reckless disregard of Plaintiff's rights and interests.
- 37. The effects of Defendant's employment practices deprived Plaintiff of equal employment

opportunities and otherwise adversely affected her status as an employee because of her race.

- 38. As a direct result of Defendant's willful, wrongful, and unlawful actions in discrimination against Plaintiff because of her race, Plaintiff has suffered severe emotional distress, humiliation, embarrassment, loss of self-esteem, and has sustained loss of income, loss of benefits, loss of future earning power, back pay, and front pay.
- 39. The above described acts and omissions of Defendant with regard to Plaintiff were egregious and were committed with a malicious, willful, and/or reckless indifference to the federally protected rights of Plaintiff.
- 40. Said acts and omissions of Defendant were committed by and through their management employees within their agency relationships with Defendant.
- 41. The extreme and outrageous acts and omissions of Defendant merit the imposition of punitive damages.

WHEREFORE, Plaintiff Rasheetta Milas prays that this Court:

- (a) accept jurisdiction over this matter;
- (b) impanels and charges a jury with respect to the causes of action; and
- (c) awards the following damages:
 - i. back pay, front pay, and all lost benefits along with pre and post judgment interest;
 - ii. punitive, liquidated, and compensatory damages including, but not limited to, damages for pain and suffering, anxiety, humiliation, physical injury, and emotional distress in order to compensate her for the injuries she has suffered and to signal to other employers that such acts in employment are repulsive to legislative enactments and public policy;
 - iii. reinstatement with applicable seniority, attorneys' fees, expert witness fees, the costs of this action, and expenses as provided for by applicable Federal and Pennsylvania state statutes; and
 - iv. any other relief which this Court deems just and equitable.

COUNT II

PHRA - Race Discrimination/Harassment in Employment

- 42. Plaintiff incorporates paragraphs 1 through 41 as though set forth in full herein.
- 43. By the conduct set forth in the Statement of Facts above, Defendant engaged in unlawful employment discrimination in violation of the Pennsylvania Human Relations Act, 43 P.C. Sections 953 and 955.
- 44. Taken together, the acts outlined above, up to and including her ultimate termination, describe a pattern of intentional discrimination and disparate treatment against Plaintiff on account of her race with respect to the terms and conditions of her employment.
- 45. Taken together, the acts outlined above were intentional and describe a hostile work environment based on race.
 - (a) Plaintiff suffered the intentional discrimination outlined above because of her membership in a protected class black.
 - (b) Such discrimination was pervasive and regular.
 - (c) Such discrimination detrimentally affected Plaintiff.
 - (d) Such discrimination would have detrimentally affected a reasonable person of the same protected class in her position.
 - (e) There existed in the corporate Defendant respondent superior liability for the actions of its agents and employees.
- 46. The unlawful employment practices outlined above were intentional.
- 47. Defendant engaged in the unlawful employment practices outlined above with malice or reckless indifference to the state and municipality protected rights of Plaintiff.
- 48. As a result of Defendant's action and conduct, Plaintiff has suffered emotional pain and distress, loss of income, loss of benefits, mental anguish, and loss of enjoyment of life's pleasures.

WHEREFORE, Plaintiff Rasheetta Milas prays that this Court:

- (a) accept jurisdiction over this matter;
- (b) impanels and charges a jury with respect to the causes of action; and
- (c) awards the following damages:
 - back pay, front pay, and all lost benefits along with pre and post judgment interest;
 - liquidated, and compensatory damages including, but not
 limited to, damages for pain and suffering, anxiety, humiliation,

physical injury, and emotional distress in order to compensate her for the injuries she has suffered and to signal to other employers that such acts in employment are repulsive to legislative enactments and public policy;

- iii. reinstatement with applicable seniority, attorneys' fees, expert witness fees, the costs of this action, and expenses as provided for by applicable Federal and Pennsylvania state statutes; and
- iv. any other relief which this Court deems just and equitable.

COUNT III

Retaliation

- 49. Plaintiff incorporates paragraphs 1 through 48 as though set forth in full herein.
- 50. As outlined in the statement of facts, Plaintiff engaged in the opposition of unlawful employment practices, Defendant's described acts and omissions constituting violations of Title VII and the PHRA by making complaints of such treatment to management.
- 51. Plaintiff's said opposition was a protected activity.
- 52. Defendant harassed Plaintiff, detrimentally affected the terms and conditions of her employment and ultimately terminated her for engaging in these protected activities.
- 53. Defendant's acts of discrimination as aforesaid were intentional, willful, and in reckless disregard of Plaintiff's rights and interests.
- 54. By the conduct set forth in the Statement of Facts above, Defendant engaged in unlawful employment discrimination in violation of 42 U.S.C. Section 2000e3(a) and the PHRA.
- 55. As a direct result of Defendant's retaliation, Plaintiff has suffered severe emotional distress, humiliation, embarrassment, loss of self-esteem, and has sustained loss of income, loss of benefits, loss of future earning power, back pay, and front pay.

WHEREFORE, Plaintiff Rasheetta Milas prays that this Court:

- (a) accept jurisdiction over this matter;
- (b) impanels and charges a jury with respect to the causes of action; and
- (c) awards the following damages:

- i. back pay, front pay, and all lost benefits along with pre and post judgment interest;
- ii. punitive, liquidated, and compensatory damages including, but not limited to, damages for pain and suffering, anxiety, humiliation, physical injury, and emotional distress in order to compensate her for the injuries she has suffered and to signal to other employers that such acts in employment are repulsive to legislative enactments and public policy;
- iii. reinstatement with applicable seniority, attorneys' fees, expert witness fees, the costs of this action, and expenses as provided for by applicable Federal and Pennsylvania state statutes; and
- iv. any other relief which this Court deems just and equitable.

JURY DEMAND

Plaintiff requests trial by jury on all counts.

Dated: 9/26/2023

/s/ Albert J. Michell

Albert J. Michell, Esquire

Attorney ID: 76797

ALBERT J. MICHELL, P.C.

40 West Evergreen Avenue, Suite 101

Philadelphia, PA 19118

Send correspondence to:

PO Box 4062

Philadelphia, PA 19118

Telephone: 215.922.2588

Validation of Signature Code: AJM4598

EXHIBIT "1" NOTICE OF RIGHT TO SUE LETTER

EEOC Form 161-B (01/2022)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Rasheetta C. Milas 2319 Montrose St PHILADELPHIA, PA 19146

From:

Philadelphia District Office 801 Market St, Suite 1000 Philadelphia, PA 19107

EEOC Charge No.

EEOC Representative

Telephone No.

530-2023-04565

Legal Unit Representative

267-589-9707

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA must be filed in a federal or state court <u>WITHIN 90 DAYS</u> of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Less than 180 days have elapsed since the filing date. I certify that the Commission's processing of this charge will not be completed within 180 days from the filing date.

The EEOC is terminating its processing of this charge.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Digitally Signed By: Karen McDonough 09/14/2023

Enclosures(s)

Karen McDonough Deputy District Director

Patricia Williams
Pathways to Housing
5201 OLD YORK RD
PHILADELPHIA, PA 19141
Nancy R Ryan
McKinley & Ryan, LLC
238 W MINER ST APT 1
West Chester, PA 19382